

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
AH LIQUIDATION, INC., et al.,¹) Case No. 21-10883 (CTG)
)
) (Jointly Administered)
Debtors.)
Objection Deadline: December 31, 2021 at 4:00 p.m.

NOTICE OF FILING OF FEE APPLICATION

PLEASE TAKE NOTICE that Pachulski Stang Ziehl & Jones LLP (“PSZ&J”), as counsel for the debtors and debtors in possession (the “Debtors”) in the above-captioned case, has filed its *Third Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Counsel for the Debtors and Debtors in Possession for the Period From August 1, 2021 Through August 31, 2021* (the “Application”) seeking fees in the amount of \$60,285.00 and reimbursement of actual and necessary expenses in the amount of \$456.89 for the period from August 1, 2021 through August 31, 2021.

PLEASE TAKE FURTHER NOTICE that any objection or response to the Application must be made in writing and be filed with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **December 31, 2021 at 4:00 p.m. prevailing Eastern Time.**

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the objection or response, if any, upon the following: (i) the Debtors, c/o of Carl Marks Advisory Group LLC, 900 Third Avenue, 33rd Floor, New York, NY 10022, Attn: Jonathan

¹ The Debtors, along with the last four (4) digits of each Debtor’s federal tax identification number are: AH Liquidation, Inc. (8411); AH IP Liquidation, Inc. (7594); BP Liquidation Corp. (6483); QAA Liquidation, Inc. (5613); and RM Liquidation, Inc. (0430). The Debtors’ business address is 81 Thompson Street, Asheville, NC 28803.

Killion (jkillion@carlmarks.com); (ii) proposed counsel for the Debtors, (a) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19899-8705 (Courier 19801) Attn: Laura Davis Jones (ljones@pszjlaw.com) and Timothy P. Cairns (tcairns@pszjlaw.com), and (b) Chapman and Cutler LLP, 1270 Avenue of the Americas, New York, New York 10020, Attn: Larry G. Halperin (halperin@chapman.com) and Joon P. Hong (joonhong@chapman.com); (iii) counsel to the DIP Agent and Administrative Agent, (a) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: David N. Giffiths (david.griffiths@weil.com) and Bryan R. Podzius (bryan.podzius@weil.com), and (b) Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, DE 19801, Attn: Zachary I. Shapiro (shapiro@rlf.com); (iv) counsel to the Committee; (v) any fee examiner appointed in these cases; and (vi) the Office of The United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Richard L. Schepacarter (richard.schepacarter@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that on February 5, 2021, the Bankruptcy Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “Order”) [Docket No. 109]. Pursuant to the Order, in the absence of timely filed objections or responses, and upon the filing with the Bankruptcy Court of a certification of no objection, the Debtor is authorized to pay the professionals eighty percent (80%) of the fees, and one hundred percent (100%) of expenses without further notice or hearing. All fees and expenses paid to the professionals are subject to final approval by the Court.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 10, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)

David M. Bertenthal (CA Bar No. 167624)

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